

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JENNIFER L. MILLER,

Plaintiff,

V.

MICHAEL J. ANDERSON, *et al.*,

Defendants.

and

FIRSTENERGY CORP.,

**Nominal Defendant.**

CASE NO. 5:20-cv-01743-JRA

JUDGE JOHN R. ADAMS

**MICHAEL J. DOWLING’S JOINDER IN THE D&O DEFENDANTS’ MOTION FOR ENTRY OF PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 26(c), and for the applicable reasons more fully stated in The D&O Defendants’ Motion for Protective Order (doc. #185) and Memorandum in Support (doc. #185-1), Michael J. Dowling (“Dowling”) respectfully moves the Court to enter the proposed protective order, attached as Exhibit 1 (doc. # 185-2) to The D&O Defendants’ Motion For Entry of Protective Order. Dowling notes that the proposed protective order containing the “Attorneys’ Eyes Only” designation conforms to the Northern District’s form order (see Local Rules, Appendix L, at n.2), it is consistent with the Court’s direction at the Case Management Conference on November 8, 2021, and it is warranted because discovery in this case involves sensitive information that should be entitled to that heightened protection.

Dated: November 23, 2021

Respectfully submitted,

/s/John A. Favret

John A. Favret (0080427)

JOHN F. MCCAFFREY (0039486)

TUCKER ELLIS LLP

950 Main Avenue – Suite 1100

Cleveland, OH 44113

Tel: 216.592.5000

Fax: 216.592.5009

E-mail: [john.mccaffrey@tuckerellis.com](mailto:john.mccaffrey@tuckerellis.com)

[john.favret@tuckerellis.com](mailto:john.favret@tuckerellis.com)

*Attorneys for Defendant Michael J. Dowling*

**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed electronically on November 23, 2021. Notice of this filing will be sent to all electronically registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ John A. Favret

John F. McCaffrey (0080427)

*One of the Attorneys for Defendant*

*Michael J. Dowling*